ACCOUNTABILITY IN HEALTH CARE: ACCREDITATION AND BEYOND

Uniformed Services University of Health Sciences

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Alfred S. Buck, MD, FACS

Partner

Edward Martin & Associates, Inc.

OVERVIEW

- SETTING THE STAGE
- DEFINITIONS
- SOME MILESTONES
- KEY ASPECTS OF ACCREDITATION
- RECONCILING PERFORMANCE
- CURRENT ISSUES

The Tanker *Prestige*

- split single hull - 20 million gallons heavy fuel oil sank off Spain
- JAPAN - BUILT 1976 - NOW "RICKETY"
- BAHAMAS - REGISTRATION
- GREECE BASED LIBERIA MANAGEMENT CO.
- RUSSIA CHARTER SUBSIDIARY BASED IN SWITZERLAND
- INSURED IN GREAT BRITAIN
- HONG KONG DRYDOCK INSPECTION - 2001
- OIL GOING FROM LITHUANIA TO GIBRALTA, SINGAPORE
- GREEK CAPTAIN - ARRESTED BY SPAIN
- $42m FIRST CLEANUP; $300m/yr FISHING INDUSTRY CLOSED
- REAL OWNERS NOT MENTIONED

NY Times 20Nov02; Wash.Post 22Nov02

WHAT DO THESE ENTITIES HAVE IN COMMON?

- ALASKA AIRLINES
- FIRESTONE / BRIDGESTONE
- RAILTRACK
- SNOW BRAND MILK PRODUCTS
- HOSPITAL CORPORATION OF AMERICA
- MCWANE INC.

ENVIRONMENTAL ASPECTS

- NATIONAL HEALTH POLICY
- DEMOGRAPHICS
- RECONFIGURATION
- PERFORMANCE MEASUREMENT
- ERROR PREVENTION / SAFETY
- ACCOUNTABILITY

TO BE ACCOUNTABLE...

- accountable *adj.*
  - 1) responsible; required to account for one's conduct (actions).
  - 2) explicable, understandable.
- accountability *n.*
- accountably *adv.*

The Oxford Modern English Dictionary - 1992

ACCOUNTABILITY

FOR ALL "PROVIDERS" IN HEALTH CARE

...

- The capability and activities of responsible individuals, over time
  - to explain experience (especially quality and value)
  - related to specific health care services
  - to various interested parties
  - using information derived from monitoring, managing, and improving these services and the health status of specific benefici ulations.

- A. S. Buck, MD

EMERGING REALITY

- “Health care has become a collective activity. But health care is not yet organized to support collective practice.”
  - Paul N. Uhlig, MD
  - Associate Professor of Cardiothoracic Surgery, Dartmouth Medical School
  - Director, Cardiac Program, Concord Hospital, Concord, N.H.

ACCREDITATION IS.....

- A determination, by an accrediting body, that an eligible entity complies with applicable standards (necessary for clinical quality and improvement). (The determination and compliance are achieved through processes that enable accountability throughout an organization.)

- A. S. Buck, MD

HEALTH CARE QUALITY……

– Quality is the degree to which health services
  - for individuals and populations
  - increase the likelihood of desired health outcomes and are
  - consistent with current professional knowledge.

- Institute of Medicine, 1989

BUT ON THE OTHER HAND -

SEVEN PILLARS OF QUALITY”

- EFFICACY
- EFFICIENCY
- OPTIMALITY
- ACCEPTABILITY
- LEGITIMACY
- EQUITY
- COST

Avedis Donabedian
1919 - 2000

EARLY MILESTONES...

- 1910 FLEXNER REPORT
- 1910 ERNEST CODMAN (END RESULTS THESIS)
- 1912 FED. STATE MED. BOARDS
- 1913 AMERICAN COLLEGE OF SURGEONS
- 1917 HOSPITAL STANDARDIZATION PROGRAM - "MINIMUM STANDARD" (5)

POST WW II...

- 1951 HOSPITAL STANDARDIZATION COMMITTEE BECAME JCAH
- 1965 PL 89 - 97 MEDICARE ACT
- 1966 JCAH STANDARDS: OPTIMAL ACHIEVABLE vrs. COP: BASIC
- 1973 HMO ACT

MORE RECENT MILESTONES...

- 1986 HCQIA (PL99-660) - NPDB
- 1991 HMO ACCREDITATION BEGUN (NCQA)
- 1997 [AMAP]
- 1998 BALDRIDGE AWARD (Healthcare Criteria For Performance Excellence)
- 2001 ISO 9004

ACCREDITATION: KEY ELEMENTS

- COMPREHENSIVE EVALUATION
- EXTERNAL AGENT
- CONSENSUS-BASED STANDARDS
- SITE SURVEY(S)
- SUPPORT TOOLS
- PUBLIC REPORTS
- EDUCATIONAL PRODUCTS
- ORGANIZATIONAL ENGAGEMENT

ACCREDITATION STANDARDS:

- ADDRESS MULTI-DIMENSIONAL ASPECTS OF QUALITY
- BROAD CONSENSUS PROCESS - WISDOM / EVIDENCE
  - "…increase the likelihood of desired…outcomes…"
  - "…consistent with professional knowledge…"
- CONSISTENT WITH QUALITY MANAGEMENT SCIENCE
  - structure, process, outcome
- PERFORMANCE MEASUREMENT UTILIZATION
- POLICY AND REGULATORY ENVELOPE

ACCREDITATION PROCESS

HOW IS ACCOUNTABILITY ENABLED?

- LEVERAGES LEADERSHIP, GUIDES STAFF
- LOCKS ACCOUNTABILITY TO QUALITY, IMPROVEMENT
- USES EDUCATION (NOT SANCTION) AS CHANGE ENGINE
- ENGAGES PERFORMANCE MEASUREMENT FRAMEWORK

JCAHO / NCQA

- SIZE
- GOVERNANCE
- FOCUS
- STANDARDS
- PRODUCTS
- PERFORMANCE MEASUREMENT
- MARKET PENETRATION
- CHALLENGES

RECONCILING ACCOUNTABILITY WITH PERFORMANCE

- SPECTRUM OF PERFORMANCE - HCOs
- VARIOUS MECHANISMS FOR O & A
- ALIGNING MECHANISMS IN CURRENT ENVIRONMENT
  - ERROR REDUCTION / SAFETY MANAGEMENT
  - AVOIDANCE OF ACCOUNTABILITY
  - FRAUD AND OTHER CRIMINAL ACTIVITY

ACCREDITATION HAS "PUSHED" THE POLICY ENVELOPE

- "HORIZONTAL" INTEGRATION
- PATIENT RIGHTS
- RESTRAINT AND SECLUSION
- ENVIRONMENT OF CARE
- SENTINEL EVENTS & ROOT CAUSE ANALYSES

THE CURRENT "ENVELOPE" (REGULATORY NEEDS)

- CONFIDENTIALITY
- TORT REFORM
- DATA QUALITY
- FINANCIAL STABILITY
- ALIGNMENT OF OVERSIGHT MECHANISMS

UNDERSTAND RESOURCE STABILITY - THE "HIGH" PERFORMER

- "REASONABLE" INVESTMENT IN PLANT AND EQUIPMENT
- ROBUST CASH BALANCE PRODUCES INVESTMENT INCOME
- CODE AGGRESSIVELY
- CHARGE PREMIUM PRICES WHEN ABLE TO
- CONTROL COSTS (LOSs, PROTOCOLS, LABOR PRODUCTIVITY, ALL > AVERAGE)

J. Duncan Moore Jr. quotes William Cleverley, President, Center for Healthcare Industry Performance Studies (CHIPS) in
Modern Healthcare - June 7, 1999

ENHANCING ACCOUNTABILITY: MHS OPPORTUNITIES

- OVERSEAS SETTINGS
- CREDENTIALS: (CCQAS / VETPRO)
- PROJECT ODYSSEY (AFSG, AFIA)
- TRICARE - “NEW ENTITIES”
- ORYX, HEDIS, PGs, NQMP
- HIGH RISK DRGs
- SAFETY AGENDA

TWO YEARS AFTER IOM REPORT - 2000

- MEDICATION ERRORS
  - 2.5 % HOSPITALS HAVE AUTOMATED DRUG ORDERING SYSTEMS (LEAPFROG GROUP - FORTUNE 500)
- WRONG-SITE SURGERY
  - 5 - 12 SUCH SENTINEL EVENTS PER MONTH (JCAHO)
- HOSPITAL ACQUIRED INFECTIONS
  - 50% OF ESTIMATED 2 MILLION / YR. PREVENTABLE (CDC)

TWO YEARS AFTER IOM REPORT - 2000

- FATIGUE & SUPERVISION OF RESIDENTS
  - NY ONLY STATE TO HAVE 80HRS LIMIT - "ROUTINELY IGNORED BECAUSE THE FINES...ARE SO LOW"
- NURSING SHORTAGE
  - UNDERSTAFFING IN 1,609 SENTINEL EVENTS (JCAHO)
  - 126,000 RN VACANCIES (AHA)
  - 56% HOSPITALS EMPLOY "TEMPORARY" NURSES (AHA)

S. G. Boodman, Wash. Post. Dec. 3, 2002

JCAHO SAFETY GOALS - 2003

- IMPROVE
  - ACCURACY OF PATIENT ID
  - EFFECTIVENESS OF COMMUNICATION
  - USE OF HIGH ALERT MEDICATIONS (eg KCL)
  - USE OF INFUSION PUMPS
  - EFFECTIVENESS OF CLINICAL ALARM SYSTEMS
- ELIMINATE
  - WRONG (SITE, PATIENT, PROCEDURE) SURGERY

EMERGING AREAS OF PERFORMANCE RISK

- CHANGES IN OWNERSHIP, LEADERSHIP
- MAJOR RENOVATION
- PERSONNEL (MIX) “RESTRUCTURING”
- CHANGES IN I.T. PROGRAM
- NEW TECHNOLOGY
- FINANCIAL STRESS

ENHANCING ACCOUNTABILITY: SOME CHALLENGES

- "QUALITY" & "VALUE"
- WISDOM / EVIDENCE BLEND
- BRINGING INNOVATIONS ON LINE
- MEASUREMENT FOR *ACCOUNTABILITY*
- FINANCIAL STABILITY / RESOURCE MANAGEMENT
- ALIGNMENT OF OVERSIGHT MECHANISMS
- TIMELY AWARENESS AND ACTION

MHS - SPECIFIC CHALLENGES

- LEVEL PLAYING FIELD
- RESOURCE PROCESS STABILITY
- INTER-SERVICE / -AGENCY COLLABORATION
- RECOGNITION OF EXCELLENCE
- PARTICIPA

Final Report to Congress, DoD HQIRP, June 2001

SUMMARY

- TIME OF UNPRECEDENTED CHALLENGES
- ACCOUNTABILITY MECHANISMS - NEED ENHANCEMENT, BETTER LINKAGE
- FEDERAL SECTOR MUST INFORM NATIONAL HEALTH POLICY
- IMPERATIVE FOR MHS TO COMMUNICATE EXCELLENCE & ACCOUNTABILITY

ALASKA AIRLINES

- F.A.A. Faults Alaska Airlines But Will Not Shut It Down - Matthew Wald NYT 29Jun00 and others
  - pattern of errors and failures to correct, mechanics not qualified, skipped maintenance, pilots not told of inoperable equipment, >150 essential position vacancies, key data base entries delayed
  - (Jan 31: MD80 crashed in Pacific, all 88 dead)
  - (no maintenance standards for major failed part)

FIRESTONE / BRIDGESTONE

- A Takeover With Problems - Calvin Sims NYT 10Aug00 and others
  - (accounting fraud settlement in 1977)
  - (persistent complaints from workers)
  - recalls in 1978 - 14 million tires
  - $0.5 million fine by US govt for “concealing safety problems”
  - acquired by Bridgestone in 1980s
  - $350 millions one-time charge
  - 6.55 million tire recall (initially)
  - “Bridgestone’s *already* depressed stock sank deeper….”

RAILTRACK

- Damning Verdict on Rail Crash -
  KeithHarper and Sarah Hall Man. Guard. (series) 2001
  - 31 killed, 400 injured Oct 99 Paddington
  - Lord Cullen's Report: "institutional paralysis"
  - possible charge: corporate manslaughter
  - staff competence, poor maintenance, inadequate oversight resources, poor safety culture
  - CEO severance payoff $1.35 million quitting after prior disaster at Hatfield

RAILTRACK (contd)

- Railway Operator Accused Of Safety Lapses - Juliette Jowit Financial Times 2Nov00
  - complaints from maintenance companies
  - recruiting workers in pubs to fill gaps in night shifts, allowing workers to moonlight from other jobs, using workers with no railroad experience

SNOW BRAND MILK PRODUCTS

- Japan Food Company Battles New Scandal
  - Ken Belson, NYT 6Feb02
    - $571 million loss over two years
    - Jul 2000 13,000 people sick from contaminated milk
    - Jan 2001 repackaging imported meat as domestic for subsidy payment
    - Moody's Investor Service credit rating drop to B2 (below investment grade)

HOSPITAL CORPORATION OF AMERICA (HCA)

- HCA To Plead Guilty, Pay $95.3 Millions - Washington Post 14Dec00
  - healthcare fraud settlement with DOJ
  - charged with “systemic” conspiracy: defraud the government including MEDICARE, false statements, kickbacks to doctors, false bills
  - (eventual settlements > $1 billion)

McWane Inc.

- Alabama-based maker cast iron pipe in 10 states
- 9 deaths, 4,000 injuries, 420 OHSA safety violations since 1995 (>4 times more than its six competitors combined)
- >450 EPA violations AL, NJ, TX
- some plants annual turnover personnel 100%
- “ineffectiveness” of federal oversight inspections

David Barstow, Lowell Bergman, NYT 8-10 Jan 03